

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

Attorney at Law

Granada Hills, CA 91344

MAILING ADDRESS

Marina del Rey, CA 90292

Fax: 213-270-9456

dana@danamdouglaslaw.com

☐ Individual appearing without attorney
☒ Attorney for: Debtor

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

HANNAH KIM,

CHAPTER: 13

Debtor(s).

**DEBTOR'S MOTION TO CONVERT CASE
UNDER 11 U.S.C. §§ 706(a) OR 1112(a)**

1. Debtor hereby moves this court for an Order converting the above chapter 13 case to a case under chapter 11 on the grounds set forth below:

a. ☒ A Voluntary Petition under chapter ☐ 7 ☐ 11 ☐ 12 ☒ 13 was filed on: 04/26/2017

b. ☐ An Involuntary Petition under chapter ☐ 7 ☐ 11 was filed on: _____
☐ An Order of Relief under chapter ☐ 7 ☐ 11 was entered on: _____

c. ☐ An Order of Conversion to chapter ☐ 7 ☐ 11 ☐ 12 ☐ 13 was entered on: _____

d. ☒ Other (*specify*): Motion to Convert to Chapter 7 filed by creditor(s); Debtor and counsel have reviewed
Creditors' calculations and believe there is some validity thereto but wishes to reorganize the debt
and so requests conversion to chapter 11.

3. **Procedural Status**

a. Name of trustee appointed (*if any*): Amrane Cohen Chapter 13 Trustee

b. Name of attorney of record for trustee (*if any*): _____

4. Debtor alleges that this case has not been previously converted.

5. Debtor alleges that the motion is filed in good faith, and that Debtor is eligible for relief under the chapter for which conversion is requested.

WHEREFORE, Debtor prays that this court issue an Order (the form of which is submitted herewith and has been served) converting this case from one under chapter 13 to a case under chapter 11.

Date: 07/26/2017

Respectfully submitted,

Dana M. Douglas Attorney at Law
Printed name of law firm

/s/ Dana M. Douglas
Signature

Hannah Kim
Printed name of Debtor/trustee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
11024 Balboa Blvd., No. 431 - Granada Hills, CA 91344

A true and correct copy of the foregoing document entitled: **DEBTOR'S MOTION TO CONVERT CASE UNDER 11 U.S.C. §§ 706(a) OR 1112(a)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 07/26/2017, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

•Ali Ammar info@silveradoip.com •Nichole Glowin nglowin@wrightlegal.net, BKUDGeneral-
•Julian K Bach Julian@Jbachlaw.com, julianbach@sbcglobal.net updates@wrightlegal.net
•Amrane (SA) Cohen (TR) efile@ch13ac.com •United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov
•Dana M Douglas dmddouglas@hotmail.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* 07/26/2017, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

G.F. Korea, Inc./Ji Young Kim/Jong Dae Lee
c/o Counsel, Charles L. Murray III, Esq.
444 S. Flower St., Ste. 2530
Los Angeles, CA 90071

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* 07/26/2017, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Theodor C. Albert (Delivery)
US Bankruptcy Court - Central District of CA
411 W. Fourth St., Ste. 5085
Santa Ana, CA 92701-4593

G.F. Korea, Inc./Ji Young Kim/Jong Dae Lee
c/o Counsel, Charles L. Murray III, Esq.
via Email - cmurray@cm3law.com
via Fax 213-627-6051

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

07/26/2017
Date

DM Douglas
Printed Name

/s/ DM Douglas
Signature

SERVICE VIA US MAIL

American Express
Customer Relations 02-04-40
4315 S. 2700 W
Salt Lake City, UT 84184-04400

Bank of America
PO Box 982238
El Paso, TX 79998

BBVA Compass Bank
15 20th St. S, 9th Flr.
Birmingham, AL 35233

CA Franchise Tax Board
ATTN: Bankruptcy Dept.
MS: A-340
Sacramento, CA 95812-2952

Capital One
ATTN: General Corresp.
PO Box 30285
Salt Lake City, UT 84130-0287

Citi|Costco
PO Box 790046
St. Louis, MO 63179-0046

Citi|Cards
P Box 6500
Sioux Falls, SD 57117

G.F. Korea, Inc.
c/o Charles L. Murray III
444 S. Flower S., Ste. 2530
Los Angeles, CA 90071

Hyundai Capital America
4000 MacArthur Blvd.
Newport Beach, CA 92660

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101

G.F. Korea, Inc./Ji Young Kim/Jong
Dae Lee
c/o Charles L. Murray III
444 S. Flower St., Ste. 2530
Los Angeles, CA 90071

Seterus Inc.
PO Box 1077
Hartford, CT 06143-1077